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Police Department, Sheriff Joseph Lombardo,

Andrew Bauman, Matthew Kravetz, Supreet Kaur,

David Jeong, and Theron Young

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PHILLIP SEMPER, an individual; COREY
JOHNSON, an individual; ASHLEY
MEDLOCK, an individual; CORY BASS, an
individual; MICHAEL GREEN, an
individual; DEMARLO RILEY, an
individual; BREANNA NELLUMS, an
individual; CLINTON REECE, an individual;
ANTONIO WILLIAMS, an individual;
LONICIA BOWIE, an individual; CARLOS
BASS, an individual; and DEMETREUS
BEARD, an individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
SHERIFF JOSEPH LOMBARDÓ,
individually and in his official capacity as
Sheriff of the Las Vegas Metropolitan Police
Department; ANDREW BAUMAN,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; MATTHEW KRAVETZ,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; SUPREET KAUR, individually and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; DAVID JEONG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; THERON YOUNG, individually and

Case Number:
2:20-cv-01875-JCM-EJY

STIPULATION AND ORDER TO STAY
CASE PENDING SETTLEMENT
DISCUSSIONS

in his capacity as a Las Vegas Metropolitan Police Department Officer; CAESARS ENTERTAINMENT CORPORATION D/B/A RIO ALL-SUITES HOTEL; RIO PROPERTIES, LLC; JOHN CARLISLE, individually and in his capacity as an employee of the Rio Hotel & Casino; DOE LVMPD GANG TASK FORCE OFFICERS 1-10; DOE LVMPD OFFICERS 1-10; DOE LVMPD SUPERVISORS 1-5; DOE RIO EMPLOYEES 1-10,

Defendants.

STIPULATION AND ORDER TO STAY CASE PENDING SETTLEMENT DISCUSSIONS

Plaintiffs Phillip Semper, Corey Johnson, Ashley Medlock, Michael Green, Demarlo Riley, Clinton Reece, and Lonicia Bowie, by and through their counsel of record, Christopher M. Peterson, Esq., of American Civil Liberties Union of Nevada, and Defendants, the Las Vegas Metropolitan Police Department (the “Department” or “LVMPD”), Sheriff Joseph Lombardo (“Lombardo”), Andrew Bauman (“Bauman”), Matthew Kravetz (“Kravetz”), Supreet Kaur (“Kaur”), David Jeong (“Jeong”), and Theron Young (“Young”), collectively (“LVMPD Defendants”), by and through their counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach Coffing, hereby stipulate and agree to stay all pending deadlines so that Plaintiffs and LVMPD Defendants can enter into settlement discussions and negotiations without incurring additional attorney’s fees and costs. This Stipulation is being entered in good faith and not for purposes of delay.

1. Throughout the instant litigation, counsel for the LVMPD Defendants and identified Plaintiffs have informally discussed the possibility of settlement.

2. At this stage, LVMPD Defendants and the identified Plaintiffs have conducted some discovery and now wish to explore the possibility of settlement without incurring additional time and expense litigating the instant matter.

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1 3. As such, LVMPD Defendants and the identified Plaintiffs hereby agree and
2 request the Court enter a stay of all deadlines in the instant case until February 15, 2022.

3 4. This is the second request for a stay for purposes of settlement negotiations.

4 5. The identified Plaintiffs and LVMPD Defendants further agree and stipulate
5 that the stay does not effect any pending or outstanding written discovery responses and
6 such responses are due in accordance with the Federal Rules of Civil Procedure.

7 6. The identified Plaintiffs and LVMPD Defendants further agree and stipulate
8 that any depositions currently scheduled for deponents Detective Blake Walford for
9 November 16, 2021 and FRCP 30(b)(6) of LVMPD for December 9, 2021 are vacated. The
10 re-scheduling of these depositions and the scheduling of any additional depositions is stayed
11 until after February 15, 2022.

12 7. Notwithstanding the stay, the identified Plaintiffs and LVMPD Defendants
13 intend to and hereby agree to cooperate in the exchange of information as needed to
14 facilitate settlement.

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8. If the parties do not reach a settlement during the stay, the parties further agree and stipulate that the parties will submit a new proposed Discovery plan to the Court within fourteen (14) days of the expiration of the stay. The parties agree that the new proposed Discovery Plan must provide, at a minimum, the same number of days to complete the parties' outstanding obligations, including amending the complaint and disclosing expert witnesses, as the current Discovery Plan but for the implementation of the stay provided by this stipulation.

IT IS SO STIPULATED.

Dated this 12th day of November, 2021
AMERICAN CIVIL LIBERTIES UNION
OF NEVADA

Dated this 12th day of November, 2021
MARQUIS AURBACH COFFING

By: /s/ Christopher M. Peterson
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Metropolitan Police Department,
Sheriff Joseph Lombardo, Andrew
Bauman, Matthew Kravetz, Supreet
Kaur, David Jeong, and Theron Young

ORDER

IT IS SO ORDERED this 12th day of November, 2021.


UNITED STATES MAGISTRATE JUDGE

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